

**FILED**  
San Francisco County Superior Court

JUN 17 2019

**CLERK OF THE COURT**

By:  Deputy Clerk

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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15  
16 COUNTY OF SAN FRANCISCO

17 DEAN R. GRAFILO, DIRECTOR OF THE  
18 DEPARTMENT OF CONSUMER  
AFFAIRS, STATE OF CALIFORNIA,  
19 Plaintiff,

20 v.

21 KAISER FOUNDATION  
22 HOSPITALS/THE PERMANENTE  
MEDICAL GROUP,

23 Respondent,

24 KIMBERLY KIRCHMEYER,  
25 EXECUTIVE DIRECTOR, MEDICAL  
BOARD OF CALIFORNIA,

26 Real Party in Interest.  
27

Case No. CPF-19-516699

**[PROPOSED] ORDER ON  
STIPULATION OF PARTIES TO  
ENTRY OF ORDER COMPELLING  
COMPLIANCE WITH  
INVESTIGATIONAL SUBPOENA**

Date: June 17, 2019  
Time: 11:00 a.m.  
Dept: 302  
Judge: Hon. Ethan P. Schulman  
Trial Date: Unassigned  
Action Filed: June 12, 2019

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1 The court having duly considered the stipulation between the Petitioner and Respondent in  
2 this matter, and good cause appearing therefor,

IT IS ORDERED that Respondent TPMG shall disclose the names of the patients known to have received vaccine exemptions from Dr. Michael Fielding Allen, as well as the names and addresses of the patients' parents, no later than seventeen (17) days following the date of this Order.

7 IT IS FURTHER ORDERED that the Real Party in Interest, Medical Board of California,  
8 notify TPMG and the patients and their parents by service of a Notice to Consumer of its intent to  
9 seek copies of vaccine exemptions from Dr. Michael Fielding Allen and their medical records by  
10 release of medical information or by subpoena no later than ten (10) days following Respondent's  
11 disclosure.

If the Board receives releases for the vaccine exemptions from Dr. Michael Fielding Allen and medical records, or the parents do not object to a subpoena for the medical records within the statutory period, Respondent shall provide copies of the vaccine exemptions from Dr. Michael Fielding Allen and medical records to the Board within fifteen (15) days. Otherwise, the matter will be subject to such other and further proceedings as Petitioner and Real Party in Interest may initiate.

Dated: June 17, 2015

*F. H. P. Schr*

ETHAN P. SCHULMAN  
Judge of the Superior Court